

Case No. 24-cv-07509-DLC

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**THE BARRY WHITE FAMILY TRUST,**

Plaintiff,

v.

JOE COOLEY, RODNEY DAVID OLIVER p/k/a RODNEY-O,  
d/b/a NOT INTRESTED PUBLISHING,  
Defendant.

**Case No. 24-cv-07509-DLC**

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**MOTION FOR TRIAL BY JURY**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Defendant Rodney David Oliver, appearing pro se, hereby demands a trial by jury on all issues so triable in the above-captioned action.

**STATEMENT IN SUPPORT:**

Defendant respectfully requests that a jury — not solely the Court — determine the material facts in this matter. This case involves not just complex copyright issues, but important questions of:

- Authorship and authorship misrepresentation;
- Alleged infringement of a musical work that lacks proper deposit documentation;
- Unsubstantiated claims of current copyright ownership by Plaintiff;
- Damages, licensing rights, and contractual misrepresentation.

This case is not purely legal in nature. It involves **equity, credibility, artistic ownership, and cultural legacy** — matters best evaluated by a jury of peers, particularly given the longstanding erasure of independent Black creators in the commercial music industry.

Accordingly, Defendant respectfully requests this case be set for trial by jury.

Dated: May 23, 2025  
Chatsworth, CA

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**Respectfully submitted,**

**/s/ Rodney David Oliver**

Rodney David Oliver (Pro Se)

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2025, I caused a true and correct copy of the foregoing Objection to Proposed Protective Order (Dkt. 94) to be served upon the following parties by email and U.S. Mail:

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Respectfully submitted,  
/s/ Rodney David Oliver  
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